POMONA NEW JERSEY 08240

Aim

Angel

PE85-June 5, 1985

Frank Coolick, Chief
Bureau of Hazardous Waste Engineering
Division of Waste Management
New Jersey Department of Environmental Protection
32 East Hanover Street
Trenton, New Jersey 08625

RE: Revised Part B Application Lenox China, Pomona, NJ

Dear Mr. Coolick:

Enclosed is a copy of a flood map for the area around the Lenox plant site. No portion of the plant site is located within the 100-year floodplain boundary. We are submitting this additional facility siting information in support of Lenox China's RCRA Part B Application.

Sincerely

A.J. Gustray

Facilities Engineering

AJG/pm Enclosure CC: Mr. Ernest A. Regna, Chief Solid Waste Branch U.S. Environmental Protection Agency 26 Federal Plaza, Room 905 New York, New York 10278

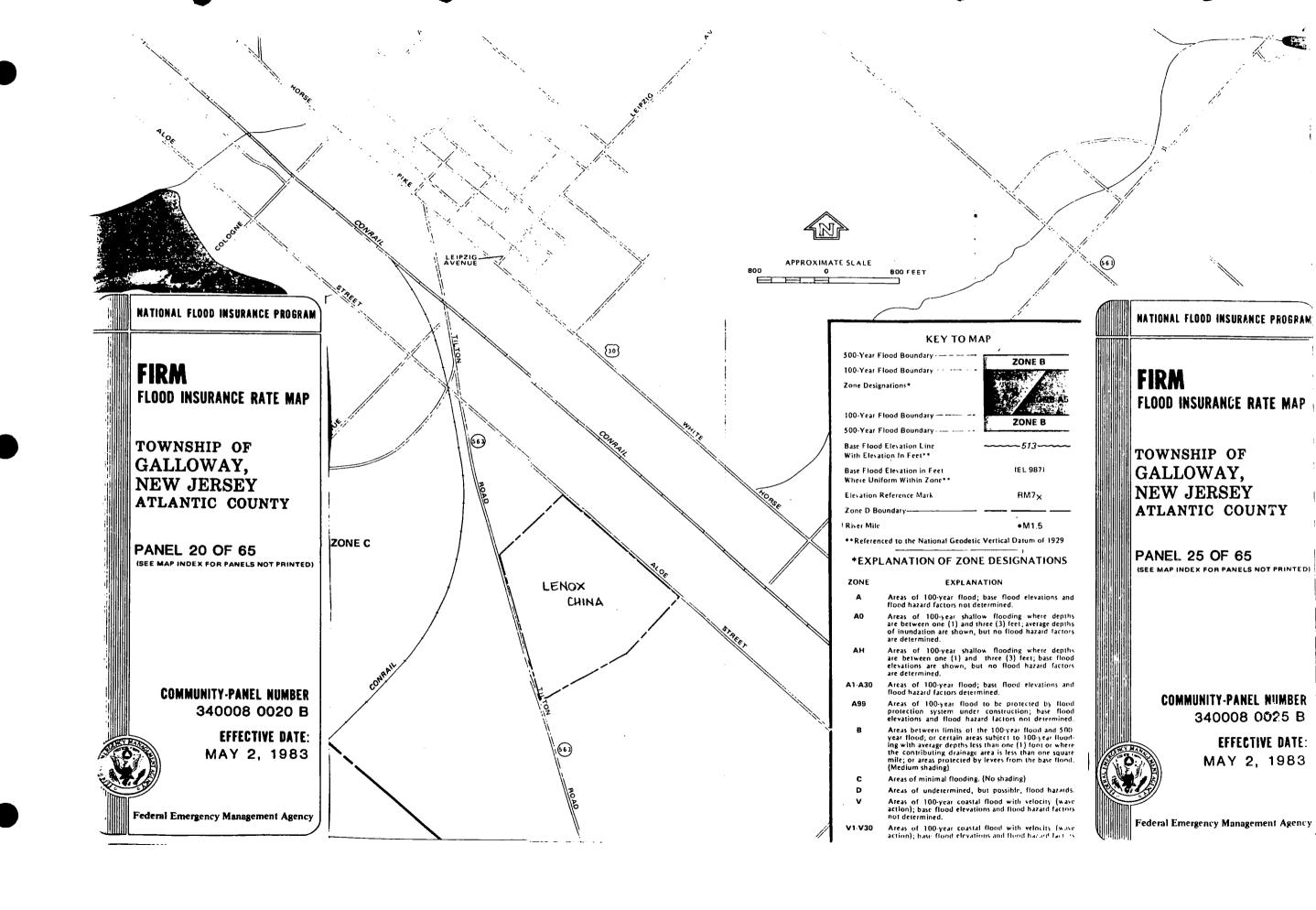
Mr. Joel Golumbek, Chief NJ/Caribbean Hazardous Waste Section U.S. Environmental Protection Agency Region II
26 Federal Plaza
New York, New York 10278

Mr. Robert Gantzer
NJ/Caribbean Hazardous Waste Section
Solid Waste Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Mr. John J. Trela, Chief Groundwater Permits Review Bureau of Groundwater Management Division of Water Resources CN-029 Trenton, NJ 08625

Mr. Robert Saar Geraghty & Miller, Inc. North Shore Atrium 6800 Jericho Turnpike Syosset, New York 11791

Mr. Richard J. Sullivan
New Jersey First, Inc.
Route 3! Professional Building
2490 Pennington Road
Trenton, NJ 08638





NEW JEHSEY 08240

VIA EXPRESS MAIL

October 8, 1987

Kenneth Goldstein
N.J. Department of Environmental Protection
Underground Storage Tank Section
Division of Water Resources
Bureau of Ground Water Quality Management
CN 028 401 E. State Street
Trenton, New Jersey 08625

Re: Underground Storage Tanks Lenox China Pomona Plant

Dear Mr. Goldstein,

On May 7, 1986 we registered two underground storage tanks at the Lenox China Plant in Pomona, N.J. (See attached NJDEP registration questionnaire form.)

These tanks were removed during our two week plant shutdown period July 20 thru August 2 because they were no longer required for plant operations. There was no problem with these tanks. The excavated area was tested and no contamination was found (see attached test reports).

The tanks were removed off site to Camden Iron, 6th & Atlantic, Camden, N.J.

Attached for your information and reference is a listing of general project information noting contractors and test laboratory.

Please call me at (609) 641-3700 if you have any questions or need additional information.

Sincerely,

Director, Facilities Engineering

AJG/pm Attachments

LNTON NEW JERSEY BY PLEASAN

## DISTRIBUTION:

w/enclosures

- T.H. Brasher
- S.F. Lichtenstein
- W.R. Miller
- S.J. Piotrowski
- R.J. Sullivan (N.J. First)
- R.A. Saar (G&M)

May 7, 1986

Underground Storage Tank Coordinator Department of Environmental Protection Division of Water Resources CN 029 Trenton, NJ 08625

Re: Underground Storage Tank Registration Questionnaire

Dear Sir,

Transmitted herewith are completed questionnaires covering the following Lenox facilities:

Lenox China, Pomona, NJ
Lenox China, Trenton, NJ
Lenox Corp. Hdqtrs., Lawrenceville, NJ

If you have any questions, please call my office (609) 641-3700.

Sincemely,

A/J/ Gustray

rector, Facilities Engineering

AJG/pm Enclosures

CC: (w/o enclosures)

Arnold Schiffman, NJDEP George G. McCann, NJDEP Dirk C. Hoffman, NJDEP BCC: (w/o enclosures)

T.H. Brasher

J.G. FitzPatrick

S.F. Lichtenstein

W.R. Miller

R.A. Saar (G&M)

R.J. Sullivan (NJ First)

E.M. Yermack



# State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION Division of Water Resources CN-029 Trenton, New Jersey 08625



FOR STATE USE ONLY												
UST #												
	YES I											
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AMT.												
AUTH.												
SP. ROUTE												
SITE PLN.												
SIGN.	:											
COMCODE												

## UNDERGROUND STORAGE TANK REGISTRATION QUESTIONNAIRE

Bureau of Ground Water Quality Management Underground Storage Tank Section (609)984-9736

		General Facility I	nformation		
Facility name:	LIE IN JOIX	C H  I   N A		11111	
2. Facility location:	TILITIOIN	I IR I O I A I D I	UMBER AND STREET		111111
	POMONA  ATILIAN  COUNTY	TIC N	CITY OR MUNICIPALITY  O 8 2 4  ATE ZIP CO	4 0	
3. Owner's mailing		ENCEVIL	NUMBER AND STREET  LE	4 8 1	
4. Owner's name:	LENIOLX	I IIN IC LOIR IP	IOIRIA I TIEID I	11111	<del></del>
	(Facility Operator)	1	T  R   A   Y   D     PERSON OR		IE I NIGI I
6. Contact telepho	ne number:	6 0	CODE EXCHANGE	NUMBER	
7. Total number of underground st			8. Total facility ur tank capacity	<del>-1</del>	
• •	is of owner (mark		_		- 🗖
CURRENT E	FORMER	C. STATE OR LOCAL GOVERNMENT	D.  PRIVATE OR CORPORATE	E. OWNERSHIP UNCERTAIN	ACC A CACILITY
10. Two copies of	a site plan are sub	omitted with this re	egistration.	A. 28 YES	B. D NO

Submit two (2) copies of SITE PLAN showing facility or property boundary, buildings and the location of ALL underground storage tanks. EITHER, an existing engineering site plan, if available, OR a neat and legible hand-drawn sketch of the site may be submitted. In either case the site plan or sketch MUST show the location and distances that tanks, buildings, and dispensers are from the facility's property boundary. Include all tanks that are operating or existing, (E); abandoned, (A); or closed, (C). Each underground tank on the site plan or sketch shall be numbered in accordance with the instructions for question 12. The number assigned to a tank on the site plan or sketch MUST match and be identical to the tank identification number assigned to that tank on this form.

All underground tanks used after January 1, 1974 including those taken out of operation, (UNLESS THE TANK WAS
 REMOVED FROM THE GROUND) must be included in this registration. All in-ground tanks shall be reported as underground tanks on this questionnaire regardless of their current status; Existing, E; Abandoned, A; or Closed C.

## SPECIFIC TANK INFORMATION

	TANK	NO.	TANK	NO.	TANK	NO.	TANK	NO.	TANK NO.		
Tank Identification Number		El		<b>5</b> 2			Ш	$\mathbb{D}$			
CASRN Number (Hazardous Substances Only)					ШШ				Ш		
Tank Age (Years)	2	2	2	2							
Tank Size (gallons)	8200		2	Ololo							
Tank Contents (MARK ONE X) A. Leaded gasoline				]		į					
B. Unleaded gasoline											
C. Alcohol enriched gasoline		<del></del>						)			
D. Light diesel fuel (No. 1-D)						)		)			
E. Medium diesel fuel (No. 2-D)						)					
F. Waste oil				]		,		) <u> </u>			
G. Kerosene (No. 1)				]		)		)			
H. Home heating oil (No. 2)	G	Į.		]		)		]			
J. Heating oil (No. 4)		5		<u> </u>	C	]		ן די די			
K. Heavy heating oil (No. 6)		5				]		ַ ב			
L. Aviation fuel		3		)		]		]	C		
M. Hazardous substances (per Fact Sheet)		<u> </u>		3		ם				]	
N. Other; Please Specify											
Tank and Piping Construction		D:-!	Table	Dining	Tank	Piping	Tank	Piping	Tank	Piping	
	Tank	Piping	Tank □	Piping							
A. Bare steel	<b>1</b> 23		<u> </u>	<u> </u>							
B. Carbon steel	<u> </u>		<u> </u>								
C. Stainless steel					<u> </u>		-				
D. Aluminum							-				
E. Polyvinyl chloride	<del>                                     </del>				1 -						
F. Concrete	-										
G. Bronze											
H. Earthen walls					<del>                                     </del>		<del>                                     </del>				
J. Fiberglass reinforced plastic			-				1 -				
K. Fiberglas-clad steel	<del>     </del>										
L. Painted/asphalt steel					1 -						
M. Vaulted											
N. Composite						<u> </u>	1 =				
P. Iron (cast or ductile)	╁╬╴		1 5								
R. Non-metallic S. Other; Please Specify	┼ -				+-		1				
B. Tank and Piping Structure (MARK ALL THAT & PPLY X)	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping	
A. Single wall	13	Di Di	103	D3.							
B. Double wall											
C. Manway in tank		改			1	D					
Internal Tank and Piping Lining (MARK ONE X)	Tank	Piping		Piping	Tank	Piping	Tank	Piping			
A. Rubber											
В. Ероху											
C. Alklyd		D									
D. Phenolic	0										
E. Glass											
F. Clay											
G. None	[23]	[28]	123	[28]				D			
11.00	1		<del> </del>		1	•			1		

3". 		K NO.		K NO. ET2	TAN	NO.	TANK	NO.	TANK	NO.
Tank I.D. No.					Tools	Dising	Took	Pining	Tank	Piping
). Tank and Piping Lining installed (MARK ONE X)	Tank	Piping	Tank	Piping	Tank □	Piping	Tank	Piping		
A. At purchase of tank  B. Retrofitted	70		<u> </u>	- 13						
	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping
. Secondary containment (MARK ALL THAT APPLY X)  A. Liner		Piping				Piping				
B. Vault				-	<del>-</del> -	-				
C. Double wall				-				<u> </u>		
D. None	<u> </u>		- IX	<u> </u>				-		
E. Other, Please Specify	- 34	<u></u> _	<u> </u>	- 91						
2. External Type/Application of Cathodic					<del></del>					
Protection (MARK ALL THAT APPLY X)						1				
	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping
A. Wrapped										
B. Sprayed		□								
C. Sacrificial anode										
D. Impressed current		□								
E. None	<b>X</b>	<u>Z2</u>	<u> </u>							
F. Other, Please Specify										
B. Monitoring detection method	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping
A. Automatic sampling										
B. Manual sampling										
C. Ground water monitoring										
D. System in secondary containment										
E. System outside backfill										
F. System within piping (piping leak detector)		D								
G. None	₩	- G	<u> </u>	- Q						
Type of monitoring/detection system	_^_	^								
WARK ALL THAT APPLY X:	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping	Tank	Piping
A. Continuous	<u> </u>								-	
B. Event activated	<u> </u>						<u></u>			
C. Audio	<u> </u>	<u> </u>								᠆᠆旹ᅱ
D. Visual	<u>-</u>									
E. Electric sensor	므				<u> </u>		<u></u>			
F. Stock/inventory control (manual)	<u>-</u>				<u> </u>		<u> </u>			
G. Stock/inventory control (electronic)									-	
H. Tile drain					(					
J. Vapor sniff wells	무		<u> </u>				<u> </u>			
K. Internal inspection	<u> </u>									
L. Other, Please Specify	- AL		-	84.		<del></del>			<del> </del>	
M. None	K	Ď	<u>K</u>	<u>K</u>						
5. Testing history recorded (MARK ALL THAT APPLY X)  A. Yes									0	
B. No	Ø	Ø	<b>X</b>	<b>V</b>			<u> </u>			
C. Test Result (MARK IF LEAKING NOW)	<u> </u>						ㅁ			
6. Leak/spill occurrence (MARK ALL THAT APPLY X)  A. Within the past 1 year										
B. Within the past 1 to 5 years		D								
C. More than 5 years ago										
D. No Records	<b>K</b> O	<b>E</b> O	<b>\$</b> 2	<b>X</b>						

	Tank I.D. No.	TANK NO.	TANK NO.	TANK NO.	TANK NO.	TANK NO.
27.	Tank Status (MARK ONE X) A. Active (operational)	D\$	DX.	<b>D</b>		
_	B. Inactive (non-operational)	ם				0
	C. Closed (temporarily out-of-service)					
	D. Closed (permanently out-of-service)					
ξĒ	E. Abandoned, in place					
פנב פברסא	F. Abandoned, in place, filled only					
	G. Abandoned, in place, sealed only					
	H. Abandoned, in place, filled and sealed					0
	J. Seasonal					
	K. Prior retrofitting work, Please Specify					
	L. Other, Please Specify					
28.	Spill recovery system on-site (MARK ONE X) A. Yes					
	B. No	<b>X</b> )	180		0	
29.	Overfill protection (tank only) (MARK ONE X) A. Yes					
	B. No	<b>1</b> 20	ĬĎ.			0
30.	Emergency shut-off mechanisms (dispensers) (MARK ONE X) A. Yes	0		0	0	
	B. No	K				
	Substance last used in tank (MARK ONE X)  A. Leaded gasoline	swer questions 31	, 32 and 33 below.			0
_	B. Unleaded gasoline					
-	C. Alcohol enriched gasoline			) [		
	D. Light diesel fuel (No. 1-D)					
_	E. Medium diesel fuel (No. 2-D)					
_	F. Waste oil					
_	G. Kerosene (No. 1)			<u> </u>		<u> </u>
_	H. Home heating oil (No. 2)		0	. 0		
_	J. Heating oil (No. 4)			<u> </u>		
_	J. Heavy heating oil (No. 6)					
	K. Aviation fuel		0			
	L. Hazardous substances (per Fact Sheet)			-		
	M. Other, Please Specify	- <del></del>	<del></del>			
32.	Estimated date last used (month/year)	Mo. Yr.	Mo. Yr.	Mo. Yr.	Mo. Yr.	Mo. Yr.
3 <u>3.</u>	Estimated quantity (gallons) left in tank					

OWNER OR OWNER'S AGENT CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

ALBERT J. GLISTRAY

(SIGNATURE:

(PHINI OR TYPE NAML)

DIRECTOR, FACILITIES ENGINEERING

Militin.

## UNDERGROUND TANK REMOVAL

## GENERAL PROJECT INFORMATION

During the week of 20 July 1987 Lenox China removed previously registered (5/7/86) underground storage tanks for fuel oil (8,200) and gasoline (2,000 gal).

- This work was planned and coordinated by the prime contractor:

S.A.R., Inc. 100 Route 130 N. Collingswood, N.J. 08108 (609) 858-1400

- Tanks were cleaned and certified non-hazardous by:

PROTANK Div. of Rezultz, Inc. PO Box 92 Franklinville, N.J. 08322 (609) 696-0222

- Tank cleanup residues were removed by:

Casie Enterprises Div. of Rezultz, Inc. N.J. Hazardous Waste Manifest #NJA0335217 Dated: July 21, 1987

- Waste was consigned to:

Rezultz, Inc.
Permit #NJD045995693

- S.A.R. excavated tanks for removal by:

Cline Crane Bellmar, N.J.

- Scrap tanks were consigned to:

Camden Iron 6th & Atlantic

- Lab samples for hydrocarbons were run by the Casie Enterprises Lab Test from:

"Test Methods for Evaluating Solid Waste" Physical/Chemical Methods 3rd Edition 11/86 U.S.E.P.A. SW-846

## UNDERGROUND TANK REMOVAL

## TANK REMOVAL ACTIONS

S.A.R. excavated tanks on 7/20/87.

On 7/21/87 the gasoline tank was filled and carefully topped-off with clean water. A large hole was cut out around the fill port. The tank was pumped out to a waiting vac-truck by PROTANK. Remaining residues were removed to the vactruck upon entry by cleaning crew.

Subsequent to cleaning the gasoline tanks, the oil tank manhole was opened. A cleaning crew entered and cleaned the tank. Residues were removed to the vactruck.

All attached piping had been previously disconnected and flushed into the gasoline and oil tanks with fresh water. The pipes were then disconnected at the tanks and cut off at the walls of the excavation. The remaining portions of underground piping were plugged with sackrete.

Tanks were lifted out with a crane and loaded onto a flatbed truck for transportation to scrap yard. Both tanks were apparently sound with no leakage observed. Large holes were cut in the sides of the tanks before lifting from excavation to Cline Crane's truck to prevent reuse.

## UNDERGROUND TANK REMOVAL

## SAMPLING & DECONTAMINATION

- All tank cleaning, removal and sampling work was monitored by Carol Karp of Geraghty & Miller, Plainview, NY 11803 (Newtown, PA office).
- Upon excavating the oil tank, an abandoned 4" fill line extending from the plant receiving dock was discovered. The line had been disconnected from the top of the oil tank, plugged and pushed aside. A new 4" line from the 10,000 gallon above ground tank had been connected in its place. The abandoned line was bent down in mid-span, sawed apart and remaining oil collected in steel, open-head drums.
- Some slight seepage was discovered around the suction line check valve where the line entered the tank. All of the contaminated soil was collected into lined fiber-board drums.
- Groundwater was observed rising in excavation and running in from the sides.
- Samples were taken at the corners of the tank locations and below the center of each tank. Due to the precarious conditions in the excavation caused by caving sides, soil samples were taken by the excavation workmen already in the hole to rig the tanks. The hole was then lined with PVC and partially filled to prevent further caving of sides.

## UNDERGROUND TANKS

## SAMPLING AND DECONTAMINATION

- A groundwater sample was taken by Carol Carp from under the center of the the fuel oil tank and sent to QC, Inc. for analysis. Note that groundwater test results were received later and they showed none detectable for fuel oil and gasoline.
- Samples were sent to the Casie Enterprises Lab for hydrocarbon analysis. Some high readings were found.
- Due to the workmen's sampling techniques and the obvious contamination of the excavation with small pieces of asphalt from the pavement over the tanks, it was decided to resample the excavation. Dirt was removed down to the PVC and placed in one pile. PVC and remaining dirt were placed in a separate pile. Both piles were covered. New samples were taken, being careful not to contaminate the bottles or soil with dirty hands or tools. The hole was lined with new PVC and partially filled.
- When the resampling results showed low or none detectable, the excavation was filled and compacted. Uncontaminated dirt from the original excavation and dirt piled on-site from excavation for the forklift ramp and truckdock apron were used for fill. The excavation was topped with a foot of crushed stone.
- The soil and PVC excavated for the resampling were moved to a remote area, spread on PVC and covered with PVC. Subsequent sampling revealed no contamination. This soil was later used for clean fill on site.
- Sample locations and results are presented on the attached sketch. Lab reports are also attached.
- Contaminated soil and oil drainings from the abandoned fill pipe were repackaged into 5 open-head steel drums and sealed. These are awaiting proper disposition to a hazardous waste incinerator.



September 21, 1987

Mr. A.J. Gustray, Director Facilities Engineering Lenox China, Inc. Tilton Road Pomona, N.J. 08240

Re: Water sample from Pomona tank excavation

Dear Mr. Gustray:

For your files, I am enclosing test results for a water sample taken by Carol Karp from the tank excavation at your Pomona plant. There is no indication of gasoline or fuel oil contamination.

Please contact me if you have any questions.

Sincerely,

GERAGHTY & MILLER, INC.

Robert a. San

Robert A. Saar, Ph.D. Associate

RAS: ts

TECKIVED SEP 25 1097



1205 INDUSTRIAL HIGHWAY . P.O. BOX 514 . SOUTHAMPTON, PA 18966-0514 . (215) 355-3900

CUSTOMER:

Geraghty & Miller

SAMPLE DATE:

07/22/87

SAMPLE NUMBER:

5226

SAMPLE IDENTIFICATION:

Project NO627PM1, Sample ID \$1, Lenox China

Parameter	Result	Detection Limit ppb
Gasoline	ND	<b>&lt; 5.</b>
Fuel Oil	ND	< 11.

NOTE: Method: Purge/Trap with P.I.D. (602)

QC, INC.



July 29, 1987

Sample Identification:

Lenox China c/o S.A.R.

Tilton Road

Pomona, NJ 08240

Date Sampled:

July 23, 1987

Date Analyzed:

July 24, 1987

Analysis:

Petroleum Hydrocarbons (PHC)

SAMPLE NO.	RESULTS, ppm
A 2	65
E 2	85
Ÿ .	· <b>&lt;</b> 30
W	₹30
" X	<b>&lt;</b> 30
Ÿ	<30
B 2	<b>♀</b> 0 <b>└</b> 30
z i	<30
2 2	<b>♦</b> 0
Z 3	<b>⊘</b> 0
Z 4	<b>₫</b> 0
z 5	Submitted by:

Robert A. White

Laboratory Director

RAW/1bh

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July 29, 1987

Sample Identification: Lenox Ch

Lenox China c/o S.A.R.

Tilton Road

Pomona, NJ 08240

Date Sampled:

July 21, 1987

Date Analyzed:

July 22, 1987

Analysis:

Petroleum Hydrocarbons (PHC)

SAMPLE NO.	RESULTS, ppm
2,000 Gal. Gas Tank - 1 A 1 B 1 C 1 D 1 E	68 298 127 105 420
8,000 Gal. #2 Oil Tank - 1 A 1 B 1 C 1 D 1 E	154 296 6,656 558 367

Submitted by:

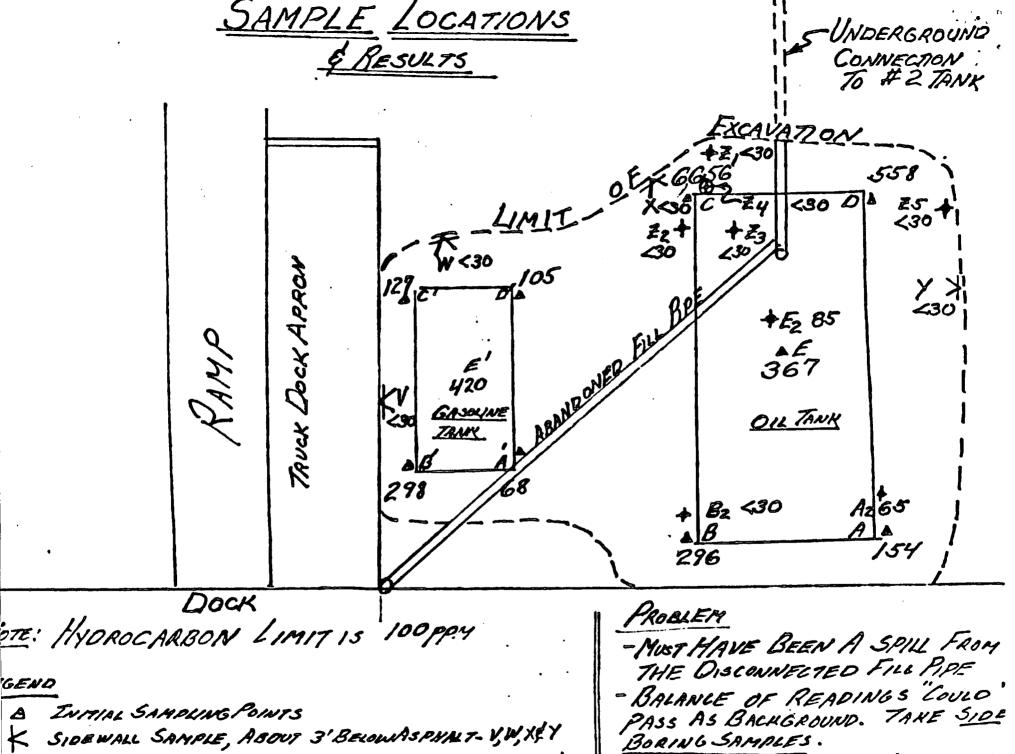
Robert A. White

Laboratory Director

RAW/1bh

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	POMONA NJ.	08240	
		•	
	DATE SAMPLED: 7/21/87		
	DATE ANALYZED: 7/22/87		
	The same and the s		
	ANALYSIS: PHC	•	
	SAMPLE NO		RESULTS, PAM
	2000 GAL GASOLINE TANK	iA	68
		18	298
		10	127
		. 20	105.
		1E	420
	FOOD GAL # 2 OIL TANK	iA	15-4
	La trade		296
		1C .	6656
		10.	5.58
		15	367
		•	
		·• <b>.</b>	
		•	Submitted by:
		•	
			Kobert A. White
			Laboratory. Director !!
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## **VIA FEDERAL EXPRESS**

(484 - February 9, 1989

Mr. Thomas Sherman, Acting Chief Bureau of Hazardous Waste Engineering State of New Jersey Department of Environmental Protection Division of Hazardous Waste Management 401 East State Street CN 028 Trenton, New Jersey 08625-0028

Re:

Hazardous Waste Permit Application

Lenox, Inc.

EPA ID No. NJD 002 325 074

Dear Mr. Sherman:

On behalf of Lenox China, we have prepared the enclosed Soil Sampling and Analysis Plan for the TCE Drum Storage Pad and the Sludge Degreaser Pit at the manufacturing facility in Pomona, New Jersey. This plan was requested by Ernest Kuhlwein in his letter of October 13, 1989 addressed to Albert Gustray.

Please feel free to call us if you have any questions regarding this plan.

Sincerely,

GERAGHTY & MILLER, INC.

Catherine L. Gilroy Senior Scientist/ Project Manager

Robert a. San

Robert A. Saar, Ph.D. Senior Consultant/ Project Officer

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Encl.

B. Tornick, USEPA Region II

S. Kinsel, DWR-BGWQC

L. Fantin, Lenox

S. Piotrowski, Lenox

A. Gustray, Lenox

## SOIL SAMPLING AND ANALYSIS PLAN

TCE DRUM STORAGE PAD AND SLUDGE DEGREASER PIT LENOX CHINA, POMONA, NEW JERSEY EPA I.D. NO. NJD 002 325 074

This soil sampling and analysis plan (SSAP) has been prepared by Geraghty & Miller, Inc. on behalf of Lenox China for the Trichloroethene (TCE) Drum Storage Pad and Sludge Degreaser Pit at the Lenox manufacturing facility in Pomona, New Jersey. The plan was requested by the New Jersey Department of Environmental Protection (NJDEP) in a letter dated October 13, 1988 from Ernest J. Kuhlwein, Jr. of the NJDEP to Albert Gustray of Lenox China concerning Lenox's Hazardous Waste Permit Application (EPA I.D. No. NJD 002 325 074).

## Sludge Degreaser Pit

One soil sample will be collected from the Sludge Degreaser Pit as shown on Figure 1. Since the overhead building awnings and the drum filling apparatus would obstruct direct drilling into the sump, and truck access would be difficult on account of the fence, the borehole will be drilled by a portable tripod rig equipped with a cat-head and split-spoon sampler at a location approximately 1 ft northeast of the edge of the sump. Prior to drilling, the sampling spoon, as well as any other down-hole equipment, will be cleaned with a detergent solution (such as Micro<sup>TM</sup>)

and rinsed with deionized water. A soil sample will be collected from the 0.5 to 1.0 ft interval. The on-site hydrogeologist will measure the location of the sampling borehole with respect to the pit. The soil will be examined and described by the hydrogeologist and placed into the laboratory-supplied sample collection bottle. The bottle will immediately be placed inside a chilled cooler. The borehole will be sealed with bentonite pellets and capped with asphalt and/or cement.

The soil sample will be analyzed by a New Jersey-certified laboratory by the Toxicity Characteristic Leaching Procedure followed by EPA Method 601 for halogenated volatile organic compounds, including trichloroethene and its break-down products 1,2-dichloroethene and vinyl chloride.

## TCE Drum Storage Pad

Six borings will be drilled around the periphery of the TCE Drum Storage Pad at the approximate locations shown on Figure 2. The locations of the two borings inside of the storage shed will depend on site accessibility; this building is used to store plant maintenance equipment and the rounded roof is relatively low where it borders the drum storage pad. The borings will be drilled by a tripod

equipped with a cat-head and split-spoon sampler at locations as close as possible to the pad.

Prior to drilling at each location, the sampling spoon, as well as any other down-hole equipment, will be cleaned with a detergent solution (such as Micro<sup>TM</sup>) and rinsed with deionized water. A field equipment blank will be prepared by running laboratory-supplied demonstrated analyte-free deionized water over the sampling equipment. The water will then be collected in laboratory-supplied sample bottles and immediately placed inside a chilled cooler.

The on-site hydrogeologist will measure the distances of the borings from the sides of the pad. At each boring location, a soil sample will be collected from a depth of 1.5 to 2.5 ft below grade. The material will be visually examined by the hydrogeologist, and a composite of the entire length of the recovered sample will be placed into the laboratory-supplied sample collection bottle. The bottles will immediately be placed inside a chilled cooler. The borehole will be sealed with bentonite pellets and capped with asphalt and/or cement.

The four samples will each be analyzed by a New Jersey-certified laboratory by the Toxicity Characteristic Leaching Procedure followed by EPA Method 601 for halogenated volatile organic compounds and EPA Method 239.2 for lead.

The field blank will be analyzed by EPA Methods 601 and 239.2.

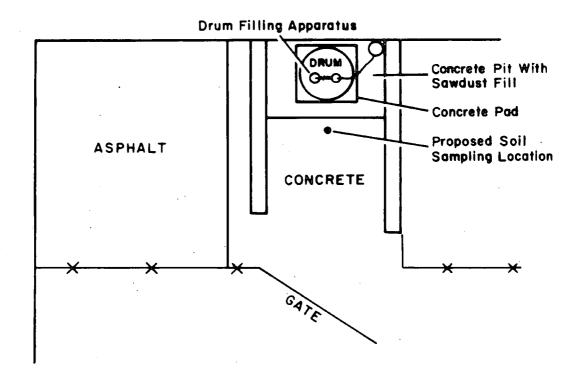


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## MAIN PLANT MANUFACTURING BUILDING





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## EXPLANATION

PROPOSED SOIL SAMPLING LOCATION.

SUBJECT

## SOIL SAMPLING AND ANALYSIS PLAN

TCE DRUM STORAGE PAD AND SLUDGE DEGREASER PIT LENOX CHINA, POMONA, NEW JERSEY EPA I.D. NO. NJD 002 325 074

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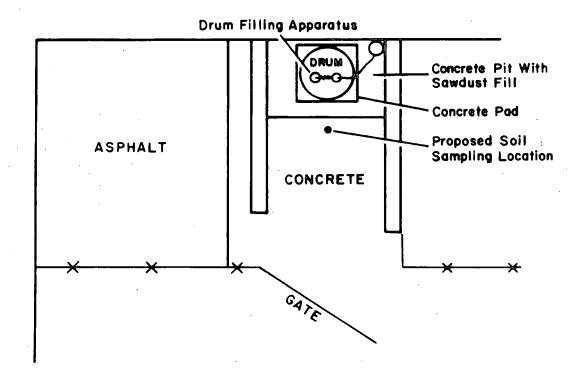
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LENOX CHINA Pomona, New Jersy

### MAIN PLANT MANUFACTURING BUILDING





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#### EXPLANATION

PROPOSED SOIL SAMPLING LOCATION.

SUBJECT

PROPOSED SOIL SAMPLING LOCATIONS, TCE DRUM STORAGE PAD

FIGURE

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CN 028 Trenton, N.J. 08625-0028 PROTECTION AGENCY
(609)635-7408 II

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HAZARDOUS WASTE

Lance R. Miller
Deputy Director
Responsible Party Remedial Action

## State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT

Michele M. Putnam
Deputy Director
Hazardous Waste Operations

John J. Trela, Ph.D., Director

Louis A. Fantin
First Asst. General Counsel
Lenox, Inc.
100 Lenox Drive
Lawrenceville, NJ 08748-2394

CAS9 - LAPR 17 1989

RE: Drum Storage Area Soil Sampling and Analysis Plan (SSAP), Lenox China, Inc., Pamona, EPA ID No. NJD 002 325 074

Dear Mr. Fantin:

The Bureau of Hazardous Waste Engineering (Bureau) received the following comments resulting from a review of the SSAP by Sara Kinsel, Bureau of Ground Water Pollution Abatement. Therefore the following amendments to the SSAP shall be made in addition to those required by the Bureau's April 5, 1989 letter to Lenox Inc.:

- One sample shall be taken at the Drum Storage Pad and Sludge Degreaser 1. Pit from an interval approximately one foot above the top of the water table (deep sample). The water table should be about 6 to 10 feet below ground surface in this area. A sample from an intermediate depth shall also be obtained. Ground water in the vicinity of the Drum Storage Pad and Sludge Degreaser Pit is known to be contaminated with trichloroethylene and thus these deeper samples will be useful in determining whether or not there are localized zones of contaminated with high levels of trichloroethylene acting as continuing source of discharges to ground water. It may or may not be practical to remove soils from these depths if contamination is present, but it will be useful to know if localized contamination is present when evaluating various ground water remediation options. Localized "hotspots" of contamination could be removed if practical in order to prevent on-going discharges to ground water. Other types of in-situ soil remediation could be considered if removal is not practical.
- 2. The last paragraph on page 3 of SSAP states that four samples will be analyzed..., but six boring locations are proposed at the Drum Storage Pad. If Lenox is not able to able to obtain the samples inside the storage shed, they shall take samples from the two alternate locations shown on the attached copy of Figure 2. However, because samples at three depth intervals will be taken at each boring location, there will

be a total of 21 samples (one boring Sludge Degreaser Pit, six borings Drum Storage Pad) and an appropriate number of field and trip blanks that will be analyzed.

If you have any questions regarding this matter, please call Mr. James Bridgewater of my staff at (609) 292-9880.

Very truly yours,

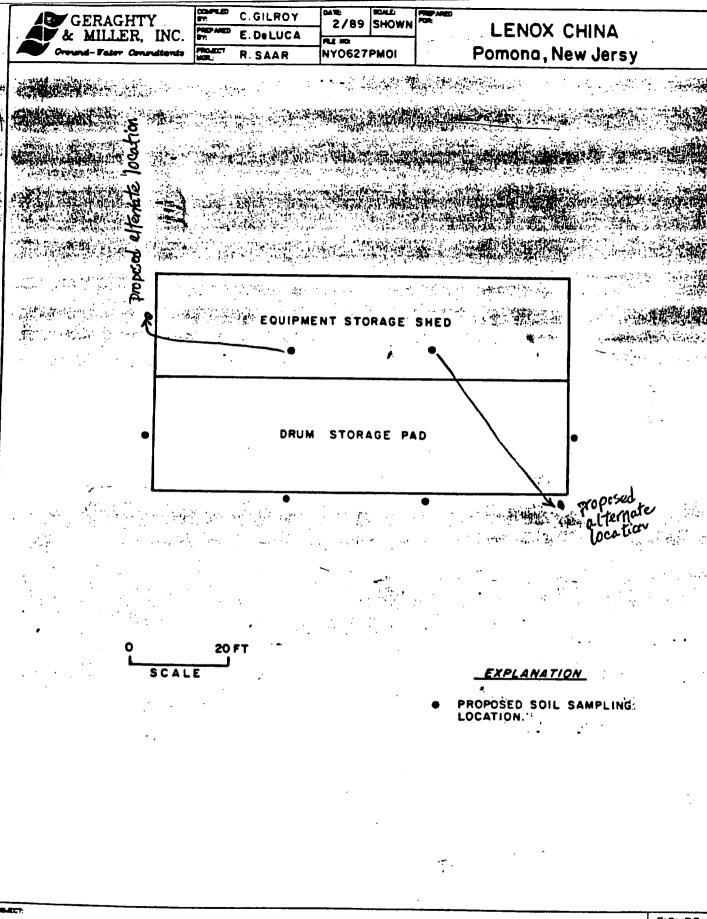
Thomas Sherman, Acting Chief

Thomas Sherman, Acting Unier Bureau of Hazardous Waste Engineering

EP52/dbm Enclosure

c: Sarry Tornick, USEPA Thomas Downey, BSE

DOCUMENT: LENOX FOLDER: DBMMCB



PROPOSED SOIL SAMPLING LOCATIONS, TCE DRUM STORAGE PAD

FIGURE 2

## ROC with Tracy Wagner, DWR, NJDEP 8/31/89

Cessna - I asked her when/a post-closure permit for the facility would be issued. I mentioned that it was projected for September this year. She said that a post-closure permit for the site would not be issued in near future but instead NJDEP was preparing a permit to require Interim Remedial Measures (IRM) and RFI. This corrective action permit would require groundwater pumping and injection in the areas of the RCRA-regulated surface impoundments and the land disposal SWMUs. This corrective action permit is expected to be public noticed within two weeks. She said that the information required for issuance of the post-closure permit is currently not available at NJDEP. The post-closure permit process for the facility will be initiated after the issuance of the corrective action permit. The facility submitted a revised post-closure plan in July 1989.

Lenox China - She said that all waste and the contaminated soil in and around the glaze basin, except the soil in the north-west side wall of the basin, were removed. The soil in the north-west side wall is contaminated above the action level but, due to creating a structural instability of the drum storage area above the soil, the contaminated soil in the north-west side wall has The area of the excavated glaze basin was not been removed. backfilled with clean fill and was paved over with asphalt. asked me whether the RCRA capping should be required. indicated that the amount of the contaminated soil is about five cubic foot and the level of the contamination is not serious, just above the action level. She also said she contacted EPA The response from Hotline is to allow the existing Hotline. closure without requiring a RCRA cap. I also said that, considering the upcoming groundwater rememdiation program and the groundwater monitoring program for the glaze basin during the post-closure care, the existing closure would be acceptable. I told her that I need to talk to Barry about this issue and would get back to her.

The company has proposed a conceptual design for closure of the <u>slip basin</u>. The proposed design includes raising the bottom of the <u>slip basin</u> above the water table by moving the waste within the unit, solidifying the sludge, and putting a RCRA cap. The proposed design has been agreed by DEP and the company. A detailed closure plan for the slip basin is expected on Sept. 17.

The company needs to have a RCRA post-closure permit. At the time of the telephone conversation, NJDEP has no schedule for the post-closure permit.

Chevron - I asked Henry Shuver when a closure plan would be approved. He said that the facility is proposing a revised closure plan, and the revised closure plan is expected on Sept. 19. I indicated that a closure plan had been revised numerous times and that NJDEP should draw the line to have a final closure plan. He said that the plan to be submitted on Sept. 19 would be

a final plan. Approval of a closure plan will be based on the closure plan. Henry said that the to-be-submitted closure plan would include a solvent recycling and disposal of the sludge from the slovent recycling to the unit. It was not clear to me how the revised closure plan is different from the previous versions.

I spoke to Tracy. It was not clear when DEP would issue a RFI permit. Tracy and I agreed that a RFI permit would be issued regardless of the schedule of the closure approval.

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	S01-01	S04-02		T01-	03		TO2	
OP-100-01	NOTICE OF DEFICE	ENCY			DWI			12/06/84
	S01-01	S04-02		T01-	03		TO2	-04
	CALL-IN FOR LD							
OP-100-02	NOTICE OF DEFICE			S				12/06/84
	S01-01	S04-02		T01-			TO2	
OP-434-01	PERMIT APPLICATN						maa	12/06/84
	S01-01	S04-02		T01-			T02	
	REVISIONS RECEIV	ED		S	JS	s 03/	00/85	04/29/85
IN	- INCOMPLETE	<b>504.00</b>		mo 3			T02	-04
	S01-01					D E	102	-04
	PONSE DEFICIENT,		vr. C	м 6\	Z 1/3	53. D		06/21/85
OP-100-03	NOTICE OF DEFICE			T01-	JSI		T02	
	S01-01	S04-02		TOT-	U.S		102	J-7
	IIN NOD #2	יבה		c	JS	R Ng/	20/85	08/12/85
OP-110-02	REVISIONS RECEIV S01-01	S04-02		T01-		5 007	T02	
2.0	DAY EXTENSION GRA			101-	<b>J J</b>	-		<del>-</del> -
	REVISIONS RECEIV			S	JS	В		08/16/85
OF TTO-02	S01-01	S04-02		T01-			T02	-
		·		_				

مسوكي			
ADD	ITIONAL RESPONSE TO ADMIN NOD #2		-
		S JSB	. 08/19/85
01 110 04	REVISIONS RECEIVED S01-01 S04-02	T01-03	T02-04
3.00	ITIONAL RESPONSE TO ADMIN NOD #2		
		S JSB	08/22/85
OP-110-05	REVISIONS RECEIVED S01-01 S04-02	mo1 -02	T02-04
	S01-01 S04-02	T01-03	102-04
ADD	ITIONAL RESPONSE TO ADMIN NOD #2		10/00/05
OP-403-02	APPLICATION REVIEWED FOR COMPLETE	ENE S JSB	10/02/85
. co	*** DESCRIPTION UNAVAILABLE ***		
,	S01-01 S04-02	T01-03	T02-04
AΩM	INISTRATIVELY CPMPLETE		
OD-439-01	FACILITY MANAGEMENT PLAN SCREEN	E SAP	11/16/85
OI 433 OI	*** DESCRIPTION UNAVAILABLE ***		
ES	_	T01-03	T02-04
00 100 00			01/24/86
OP-492-02	SITE VISIT AFTER PERMIT APPLIC CA	101 O O O O O	T02-04
	S01-01 S04-02	T01-03	
OP-100-04	NOTICE OF DEFICIENCY S01-01 S04-02	S JSB T01-03	04/01/86
	S01-01 S04-02	T01-03	T02-04
TEC	H NOD FOR DRUM STORAGE ONLY		
OP-443-01	EXPOSURE INFORMATION RECEIVED	E SSK	04/04/86
01 445 01	S04-02 T02-04		
OD-110-06	REVISIONS RECEIVED	S JSB	04/29/86
Ob-110-09	REVISIONS RECEIVED	T01-03	T02-04
	REVISIONS RECEIVED S01-01 S04-02 M STORAGE ONLY	101-03	102 01
	M STORAGE ONLY	a pum	05/09/86
OP-100-05		S DWR	
	S01-01 S04-02	T01-03	T02-04
	H NOD FOR LAND DISPOSAL		
OP-440-01	FACILITY MANAGEMENT PLAN REVIEWED	) E SWB	05/28/86
<b>01</b> 110 01	S01-01 S04-02	T01-03	T02-04
OD-492-03	SITE VISIT AFTER PERMIT APPLIC CA	LL S JGM	12/15/86
OF-492-03	S01-01 S04-02	T01-03	T02-04
00 160 01		S DWR	12/26/86
	PUBLIC NOTICE	S DWK	22/20/00
ID	- INTENT TO DENY	maa aa	T02-04
	S01-01 S04-02	T01-03	102-04
OP-200-01	FINAL DETERMINATION	S	05/22/87
PD	- PERMIT DENIED		•
	S01-01 S04-02	T01-03	T02-04
OP-100-06	NOTICE OF DEFICIENCY	S JGM	06/14/88
OF 100 00	S01-01 S04-02	T01-03	T02-04
meo		101 00	
	H NOD FOR DRUM STORAGE ONLY	s JJB	08/12/88 07/13/88
OP-110-07	REVISIONS RECEIVED S01-01 S04-02		
		T01-03	102-04
	ENSION REQUEST		20 /20 /00
OP-110-08	REVISIONS RECEIVED	S JJB	08/10/88
TN	- INCOMPLETE		
1	S01-01 S04-02	T01-03	T02-04
NEE	D MORE INFO ON CLOSURE COST ESTIMA		
VD-403-04	CIME VICIM ARMED DEDMIN ADDITO CA	ALL S JIB	09/12/88
UP-492-04	SITE VISIT AFTER PERMIT APPLIC CA S01-01 S04-02	TO1-03	T02-04
	501-01 504-02	101-02	10/13/88
OP-100-07	NOTICE OF DEFICIENCY S01-01 S04-02	S JJB	T02-04
	S01-01 S04-02	T01-03	
OP-110-09	REVISIONS RECEIVED	SJB	
	S01-01 S04-02	T01-03	T02-04
OP-180-01	RECEIVED WITHDRAWAL REQUEST	S JJB	02/08/89
T.N	- APPLIC. HAS/WILL GO < 90 DAYS S		
TII.	S01-01 S04-02	T01-03	T02-04
man			
TCE	DRUM PAD	Q TTD	09/19/89
OL-130-05	WITHDRAWAL REQUEST DETERMINATION	ט ט ט	03, 23, 03
AR	- APPROVED REQUEST	mo1 02	T02-04
	S01-01 S04-02	T01-03	102-04

1			
CLOCUDE EV	VENTS (003 CLOSURE1-J) VATUS / COVERED UNITS / COMMENTS PLAN RECEIVED - CLOSURE S01-07 S04-08 PUBLIC NOTICE - CLOSURE S01-07 S04-08 PLAN APPROVED - CLOSURE - FINAL CLOSURE		STATE: NJDWR EPA: R2PP
CTOPORE EA	NAMES ( COVERED UNITES / COMMENTS	STAFF	SCHEDULED ACTUAL
EVENT / SI	DIAN DECETOED - CLOSUPE	S JJB	05/30/89
CT-310-01	CO1-07 CO4-08	TO1-09	T02-10
<b>67</b> 040 03	DUDITO NOMEON CLOCKIDE	S.T.TB	08/17/89
CL-340-01	PUBLIC NOTICE - CLOSURE	mo1_00	TO2=10
	S01-07 S04-08	TOTOR	09/19/89
CL-360-01	PLAN APPROVED - CLOSURE	5 000	03/ 13/ 03
· ME	- FINAL CLOSURE		maa 10
	S01-07 S04-08	T01-09	T02-10
CL-380-01	CLOSURE VERIFICATION	S JJB	08/16/90
	- FINAL CLOSURE S01-07 S04-08 CLOSURE VERIFICATION S01-07 S04-08	T01-09	T02-10
POST CLOSU	RE EVENTS (002 PCLOSURE1-J) PATUS / COVERED UNITS / COMMENTS		STATE: NJDWR EPA: R2JRJ
EVENT / ST	ATUS / COVERED UNITS / COMMENTS	STAFF	SCHEDULED ACTUAL
PC-310-02	PLAN RECEIVED - CLOSURE/POST-CLOSU	UR S DWR	07/08/87
CL	- CLOSURE		
	GO4 OF MO2 OF		
CTO	SURE PLAN FOR GLAZE BASIN		
DG 200 01	FINAL DETERMINATION	E	11/30/87
PC-200-01	FINAL DETERMINATION		,
	S04-05 T02-06 SURE PLAN FOR GLAZE BASIN FINAL DETERMINATION S04-05 T02-06 DIAN DECELUED - CLOSUPE/POST-CLOSU	ID C DWD	11/30/87
PC-310-01	PLAN RECEIVED - CLOSURE/ FOST CLOSUR	UK S DWI	11, 30, 0.
PC	- POST CLOSURE		
	S04-05 T02-06	<i>:</i>	·
CL/	P-CL FOR SLIP BASIN		11/20/07
PC-330-01	P-CL FOR SLIP BASIN REVISIONS RECEIVED-CLOSURE/POST-C	LO S DWF	11/30/87
CL	- CLOSURE	•	
	S04-05 T02-06		
мор	DIFICATIONS TO CLOSURE PLAN FOR GLA	ZE BASIN	
PC-340-01	PUBLIC NOTICE - CLOSURE/POST-CLOS	UR S DWF	03/03/88
CT.	- CLOSURE		·
СП	S04-05 T02-06		
DIID	SULC NOTICE OF PERMIT FOR GLAZE BAS	TN CLOSUE	PE.
PUB	OLIC MOTICE OF PERMIT FOR GLAZE DAD	IN CHODOL	05/18/88
PC-360-01	PLAN APPROVED - CLOSURE/POST-CLOS	OK B DWI	30, 20, 50
MO	- PARTIAL CLOSURE		
1	S04-05 T02-06	_	•
	AL APPROVAL OF GLAZE BASIN CLOSUR	E	06/06/00
	CLOSURE PROCESS BEGUN	S DWF	06/06/88
YE	*** DESCRIPTION UNAVAILABLE ***		
	S04-05 T02-06		
CIA	SURE OF GLAZE BASIN	•	
PC-402-01	CLOSURE PLAN REQUESTED	S DWF	09/01/88
10 402 01	S04-05 T02-06		
DC	FOR GLAZE BASIN		
PC-210-02	PLAN RECEIVED - CLOSURE/POST-CLOS	TIR S DWE	10/04/88
		OK B BIII	,,
PC	- POST CLOSURE		
	S04-05 T02-06		<b>'</b>
PC	FOR GLAZE BASIN	TAL C DET	05/26/89
PC-404-01	REVIEW OF CLOSURE/POST-CLOSURE PL	AN 5 DWI	03/20/03
CL	*** DESCRIPTION UNAVAILABLE ***		
	S04-05 T02-06		·
SEN	T LTR REQUESTING MOD TO CLO PLN FO	R SLIP BA	ASIN
PC-330-02	REVISIONS RECEIVED-CLOSURE/POST-C	LO S DWI	08/18/89
	- CLOSURE		
	S04-05 T02-06		
, MOD	TO CLOSURE PLAN FOR GLAZE BASIN		•
DC-330-03	REVISIONS RECEIVED-CLOSURE/POST-C	LO S DWI	10/03/89
	- CLOSURE		
	S04-05 T02-06		
мог	TO CLOSURE PLAN FOR SLIP BASIN		
	, to chonour than tor part, proti		

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PC-330-04	REVISIONS RECEIVED-CLOSURE/POST-CLO	s DWR		10/19/89
CL	- CLOSURE			
	S04-05 T02-06			
MOD	TO CLOSURE PLAN FOR SLIP BASIN			100 100
PC-411-02	CLOSURE PROCESS BEGUN	S DWR		03/30/90
	*** DESCRIPTION UNAVAILABLE ***			
	S04-05 T02-06			
FOR	SLIP BASIN			
PC-340-02	PUBLIC NOTICE - CLOSURE/POST-CLOSUR	s DWR		04/12/90
PC	- POST CLOSURE			
	S04-05 T02-06			•
FOR	GLAZE BASIN POST CLOSURE & SLIP BASI	N CLOSUR	E	
PC-370-01	RECEIVE CLOSURE CERTIFICATION	S DWR		05/24/90
	- ACCORDING TO PLAN			
	S04-05 T02-06	•		
CLO	SURE CERTIFICATION RECEIVED FOR GLAZE	BASIN		
PC-360-02	PLAN APPROVED - CLOSURE/POST-CLOSUR	s DWR		06/29/90
ME	- FINAL CLOSURE			
	S04-05 T02-06			
FOR	GLAZE BASIN POST CLOSURE & SLIP BASI	N CLOSUR	E	00/04/00
PC-370-02	RECEIVE CLOSURE CERTIFICATION	s DWR		09/04/90
YE	- ACCORDING TO PLAN			
	S04-05 T02-06			
CLO	SURE CERTIFICATION RECEIVED FOR SLIP	BASIN		00/00/00
PC-200-02	FINAL DETERMINATION	E JRJ		09/30/92
	S04-05 T02-06			
CL/I	P-CL FOR SLIP BASIN		•	
POST CLOSU	RE EVENTS (500 NEW-PCP-J) ATUS / COVERED UNITS / COMMENTS FINAL DETERMINATION	S	TATE: NJDWK	EPA: KZAP
EVENT / ST	ATUS / COVERED UNITS / COMMENTS	STAFF	SCHEDULED	ACTUAL
PC-200-01	FINAL DETERMINATION	E AP		03/21/32
PJ	- RCRA PERMIT ISSUED WITH HSWA CA SC	CHED.		
	S04-SURF IMP-S T02-SURF IMP-T			
EPA	HSWA PERMIT ISSUED			





# State of New Jersey Department of Environmental Protection and Energy

Division of Responsible Party Site Remediation CN 028 Trenton, NJ 08625-0028

Scott A. Weiner Commissioner

Karl J. Delaney Director

VIA FACSIMILE CERTIFIED MAIL RETURN RECEIPT REQUESTED NO. 1261037 715

CAGR — JUN 3 0 1993

Mr. Stephen F. Lichtenstein Lenox Inc. Lawrenceville, N.J. 08648-2394

Dear Mr. Lichtenstein:

Re: Lenox China - Pomona

Tilton Road Pond Emergency Repair Plan Galloway Township, Atlantic County

The New Jersey Department of Environmental Protection and Energy (Department) has reviewed the above referenced revised Plan prepared by Eder Associates on behalf of Lenox China (Lenox) and received on June 9, 1993. The Department has determined that the above referenced plan is approved.

If you have any questions, please contact me at (609) 633-1455.

Sincerely,

Frank Faranca, Project Manager Bureau of Federal Case Management

Enclosure FFF

Wenclosuze 01/07/99-xom

c:

Andrew-Park, USEPA, Region II
Daryl Clark, NJDEPE/DPFSR/BGWPA
John Evenson, NJDEPE/DPFSR/BEMQA
John Kinkela, Lenox China, Pomona Facility

Name: Lenox China

Location: Pomera, NJ

NJ0003325074

Facility Type: 2 SI + Storage pad

Maste Volume: Brily the drumm storage area receives wastes tappeax max = 16,800 lbs/yr, max 4,200165/3 months

Proximity of Nearest Residents: ~ 1500 ft NE Botte on white Horse Lane, Nearest housing development is

Population within four miles: 23542 2,5004 N T sete = Germania Gardens

Nature of Surrounding Area: Lanox 15 in Industrial zone. Neighboring area 15 low density residential and agricultural with commercial breadential strip along white Horse Lane (Na East of site)

Primary Source of Drinking Water: (Do)

Location of Nearest Private Drinking Wells: 8-10 wells, approx 4000 ft N
(down graduent) of site. Nearest vougation
Well = 4000 ft East on

Location of Nearest Municipal Wells: No municipal wells wi 3 mile areas and downgradient of lenox

Number of Wells within Three Miles: 67 domestic; 10 commercial Industrial
8-volugation; 8 2-public supply

Location of Nearest Surface Water:

20,000 ft to nearest significant surface water - Clarks Mill Stream

Municipal Intakes on Nearest River: mummal use of Surface water we when area because of Shallow depths, low flow

NPDES Discharge:

12000211 # S30002177

Air Issues/Citizen Complaints: None

Transportation:

2-Greleases: No known releases to surface or ground water. Lessox claims a that if there was a graviter release, lead would show up in tests on their own supply wells. The latest (9/85) test results are included, which show minimal lead

Other Important Information:

P 2-5 DEP has usual permits for high use pumping operations to

3 uses on the same area: FAA at Atlantic City Aurport,

Atlantic city Racing Assoc of Lenox China, Total = 56.1 million

Garlono I month. Affect on water table?

Storm water Retention System plan is included in EIR